

Exhibit F

**DECLARATION OF GERALD THOMPSON ON BEHALF OF PROPOSED PROVIDER
OF PRIVACY & MEDICAL SHIELD + GENETIC MONITORING**

I, Gerald Thompson, declare as follows:

1. I am the Executive Vice President & Founder of CyEx llc. I have worked at CyEx since 2015 and am intimately familiar with the company and its products. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto. I submit this Declaration in support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement .

2. CyEx llc is an independent operating company and a part of Pango Holdings, which has been involved in the Identity Services industry since 1995 when it was known as Intersections Inc. and was one of the first companies to offer identity protection and remediation to consumers in the United States. Since that time, CyEx under white label brands and through its own brands, has protected more than 48 million citizens in the United States and more than 2.34 million families. CyEx has distributed its services through a focused distribution network of large U.S. financial institutions and large enterprise companies since its founding and has serviced both large and small data breach populations over the past 14 years.

3. CyEx and Pango Holdings are long-standing, well capitalized, and experienced companies that are fully capable of providing the services for this Settlement. Companies choose CyEX because CyEx has the requisite experience and knowledge to service any breach population with seamless onboarding, excellent customer service, and attention to detail. Since 2010, CyEx has serviced more than 1,700 data breaches for large and small businesses. In 2021 the company serviced some of the largest data breach incidents including two national health care providers and was awarded the three largest data breach contracts for servicing affected consumers.

4. CyEx is viewed as the most innovative provider of monitoring services for victims

of data breach incidents. CyEx is the only company that has built monitoring solutions that focus on the specific type of data breach and the most appropriate and effective service to provide the maximum security and customer support for that action. As an example, CyEx is the only provider of Medical Data Monitoring services for healthcare related data breaches; the only provider of Financial Data Monitoring services for data breaches in the banking and financial sectors and the only provider of privacy services for people whose PII has been compromised and misused in that sector. In addition, CyEx is the largest provider of Credit Monitoring in the Data Breach category other than the Credit Bureaus themselves.

5. CyEx is willing and able to be appointed by the Court as the provider of the Privacy & Medical Shield + Genetic Monitoring, as those terms are defined in the Settlement Benefits Plan to Settlement Class Members.

6. Privacy & Medical Shield + Genetic Monitoring (“Privacy & Medical Shield”) was designed and built by CyEx specifically for the 23andMe class members and includes multiple features that have never been provided to data breach or security incident victims. It is a bespoke service that incorporates the best monitoring and security capabilities available to consumers today.

7. This service provides the following features to detect and remediate across the most comprehensive list of monitoring services that has ever been used in a class action settlement for each Settlement Class Member who enrolls. As part of these service, CyEx will provide each Settlement Class Member Dark Web monitoring which will scan the Dark Web and will monitor hundreds of sites on the World Wide Web known to traffic in stolen data to identify the Personal Information of the Settlement Class Member. Below are the features that are included for all

Settlement Class Members.¹

- **Dark Web Monitoring** – Monitoring for 17 unique data categories of Settlement Class Members' sensitive data that may be exposed, listed for sale or trade on the Dark Web.
- **Stolen Data Sites Monitoring** – Monitoring of the myriad of sites on the World Wide Web (www) that traffic in the sale, or more often trade, of stolen consumer data. The URLs of these sites are constantly fluctuating and often exist for only short periods of time requiring vigilant monitoring.
- **Genetic Monitoring*** - Specially-designed monitoring capacity to scan the Dark Web for any genetic-related data specific to Settlement Class Members that may be for sale or trade. If genetic-related data is located, CyEx will alert the Settlement Class Member who may contact Customer Support to speak with a remediation specialist about identifying potential mitigation efforts.
- **Virtual Private Network (VPN)*** - Facilitates Settlement Class Members' ability to shop, bank and work online anonymously and to minimize their digital footprint.
- **Digital Vault** – Provides Settlement Class Members a secure environment in which to store their personal digital files. Through this service, Settlement Class Members are able to share access to their vital documents with family members in a protected environment.
- **Data Broker Opt-Out*** - Removes Settlement Class Members' personal data from all known data broker sites for the duration of the term of service.
- **Password Manager** – Protects Settlement Class Members' login information used to access online accounts from threat actors.
- **Private Browsing*** - Provides a private search engine (powered by Duck Duck Go) which allows Settlement Class Members to browse the internet without being targeted with ads and prevents data collection. Over time, this will minimize Settlement Class Members' digital footprint.
- **Breach Scan Tool*** - Provides Settlement Class Members the ability to verify if any email address has been implicated in a known data breach. Further mitigation services may be available from CyEx upon request.
- **Anti Phishing*** - Realtime scanning of webpages during Settlement Class Members' web sessions for threats of phishing and malware content.
- **Real-time Authentication Alerts** – Monitors Class Settlement Members' new accounts and other "credit initiation" activities to prevent identity fraud.
- **High-Risk Transaction Monitoring*** - Monitors for certain non-traditional, non-credit transactions such as money lending activities, payday loans and other

¹ Features marked with an * are uniquely offered in this comprehensive monitoring service for the 23andMe Settlement Class Members. These features have not been previously offered to class members in other data breach or privacy-related settlements.

financial transactions, for Settlement Class Members' personally identifiable information.

- **Health Insurance Plan ID Monitoring*** - Alerts Settlement Class Members that their medical information is exposed and prompts them to notify their medical insurance provider to request a new medical ID number and to deactivate the old medical ID number in order to combat fraudulent usage.
- **Medical Beneficiary Identifier Monitoring*** - Monitors for the fraudulent use of a medical beneficiary's medical identity and alerts if this identity is exposed and for sale or trade on Stolen Data Sites. Assists with outreach to insurance providers and facilitates updating medical identifiers associated with Settlement Class Members and other family members on their medical insurance plan.
- **Medical Record Monitoring*** - Monitors the Dark Web and other Stolen Data Sites for Settlement Class Members' personal healthcare/medical records. Assists with outreach to medical providers and facilitating updating reference numbers and other records associated with the individual.
- **International Classification of Disease Monitoring*** - Monitors the Dark Web and other Stolen Data Sites for the exposure of Settlement Class Members' personal medical diagnoses and assists to remediate the leaked data and alter their International Classification of Disease number in the national healthcare system.
- **National Provider Identifier Monitoring*** - Alerts Settlement Class Members when a National Provider Identifier number associated with their identity or other medical classification identifiers (e.g., Medical Beneficiary ID, Medical Record Number, International Classification of Disease Number, and Health Insurance Plan ID) have been located on the Dark Web and other Stolen Data Sites .
- **Security Freeze With All Credit Bureaus** – Allows Settlement Class Members to log onto CyEx's website and freeze their credit at all three credit bureaus.
- **\$1 Million Identity Theft & Fraud Insurance (with no deductible)** – Comprehensive reimbursement product which includes reimbursement for losses due to medical, identity and/or financial fraud.
- **Customer Support & Victim Assistance** – Providing assistance to Settlement Class Members with information, resources, and remediation when identity theft related instances and/or fraudulent healthcare related incidents occur. Provides access to expert specialists who are trained to provide restorative services.

8. The Privacy & Medical Shield + Genetic Monitoring product is not currently available for public purchase, but the closest approximation of these services which are available would retail at \$375.00 per person per year. However, this does not include the Genetic Monitoring which is a unique component offered only at this time to Settlement Class Members. The complete

list of the services and consumer benefits discussed herein will be available to Settlement Class Members on CyEx's Settlement Website once the Settlement is preliminarily approved.

9. CyEx will provide these services for thirty-six (36) months to all Settlement Class Members who enroll during the Claims Period, but any Settlement Class Member may enroll directly with CyEx during the service period. The service period will begin on an agreed upon date coinciding with the initial delivery of the enrollment codes (the "Code Effective Date") and will end thirty-six (36) months after the Code Effective Date for all enrolled Settlement Class Members.

10. CyEx will not market or upsell additional services to enrolled Settlement Class Members.

11. At the end of the service period, CyEx will not automatically extend the services to Settlement Class Members. However, additional months may be purchased by Class Counsel if there are funds available due to unclaimed settlement payments. No later than thirty (30) days before the end of the services, CyEx will contact the enrolled Settlement Class Members to inform them that the services will terminate unless an extension is provided.

12. CyEx will provide Class Counsel with quarterly updates as to the number of Settlement Class Members who have enrolled in Privacy & Medical Shield + Genetic Monitoring Services.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed this 6th day of September , 2024, in New Jersey.



Gerald Thompson
Executive Vice President & Founder
CyEx llc.

4872-4477-0786, v. 1